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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STATEMENT OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS IN RESPONSE TO THE  
COURT'S INQUIRY REGARDING  
POSSIBLE CONSENT TO THE  
ESTIMATION PROCEEDINGS**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Re: Docket No. 3091

1 The Official Committee of Unsecured Creditors (the “Official Committee”) respectfully  
2 submits this statement in response to the Court’s comments at the August 14, 2019 hearing (the  
3 “Hearing”) with respect to of the Debtors’ *Motion Pursuant to 11 U.S.C §§ 105(a) and 502(c) for*  
4 *the Establishment of Wildfire Claims Estimation Procedures* (the “Estimation Motion”) [Docket  
5 No. 3091].<sup>1</sup>  
6

7 At the Hearing, the Court requested that the Official Committee poll the Debtors, the Ad  
8 Hoc Group of Subrogation Claim Holders and the Official Committee of Tort Claimants to  
9 determine whether those parties would agree to have all issues in dispute in the anticipated claims  
10 estimation process heard and decided by the Bankruptcy Court. The Official Committee has  
11 received responses from the parties and reports that there is not unanimous consent to the Court’s  
12 inquiry.  
13

14  
15 Dated: August 19, 2019

16  
17 **MILBANK LLP**

18 /s/Gregory A. Bray  
19 DENNIS F. DUNNE  
20 SAMUEL A. KHALIL  
21 GREGORY A. BRAY  
22 THOMAS R. KRELLER

23  
24 *Counsel for the Official Committee of*  
25 *Unsecured Creditors*  
26

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28 <sup>1</sup> Capitalized terms not defined herein have the meaning ascribed to them in the Wildfire Fund Motion.